

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

HARRY WILLIAMSON

Plaintiff,

vs.

LORAIN COUNTY, et al.

Defendants.

CASE NO. 1:23-cv-01507

JUDGE JAMES GWIN

**PLAINTIFF HARRY WILLIAMSON'S RESPONSES TO DEFENDANT LORAIN
COUNTY BOARD OF COMMISSIONERS' REQUESTS FOR ADMISSION**

Plaintiff Harry Williamson submits the following responses to Defendant Lorain County Board of Commissioners's Requests for Admissions.

REQUESTS FOR ADMISSIONS

1. Admit that your employment as the Lorain County 911 Director was an at-will position.

ANSWER: Admit.

2. Admit that, during your employment as the Lorain County 911 Director, you never disclosed your romantic relationship with Michelle Hung to any Lorain County employee or official including Matt Lundy, David Moore, Tom Williams, and Jennifer Sinatra.

ANSWER: Admit.

3. Admit that, during your employment as the Lorain County 911 Director, Michelle Hung was your superior.

ANSWER: Deny.

4. Admit that, during your employment as the Lorain County 911 Director, you had sex with Michelle Hung.

ANSWER: Admit.

5. Admit that, during your employment as the Lorain County 911 Director, you had sex with Michelle Hung inside a building owned by Lorain County.

ANSWER: Admit.

6. Admit that, during your employment as the Lorain County 911 Director, you had sex with Michelle Hung on company time.

ANSWER: Deny.

7. Admit that, during your employment as the Lorain County 911 Director, you had sex with Michelle Hung on company time inside a building owned by Lorain County.

ANSWER: Deny.

8. Admit that, during your employment as the Lorain County 911 Director, you kissed Michelle Hung inside a building owned by Lorain County.

ANSWER: Admit.

9. Admit that the conduct alleged in Paragraphs 15-23 of your First Amended Complaint concerning James Cordes occurred while you were employed at Centurylink.

ANSWER: Admit.

10. Admit that you voluntarily retired from Centurylink on or around October 30, 2020.

ANSWER: Admit.

11. Admit that, because the subpoenas you issued in the case captioned *Thomas Williams v. Michelle Hung, et al.*, Case No. 22CV971623 filed in the Cuyahoga County Court of Common Pleas were quashed, you and your counsel, Attorney Brian Bardwell, were ordered not to open or review records produced in response to those subpoenas.

ANSWER: Deny.

12. Admit that your counsel in the case captioned *Thomas Williams v. Michelle Hung, et al.*, Case No. 22CV971623 filed in the Cuyahoga County Court of Common Pleas, Attorney Brian Bardwell, was ordered to pay \$79,959.50 as a sanction for issuing improper subpoenas.

ANSWER: Deny.

Respectfully submitted,

/s/Brian D. Bardwell

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